



## Filing Receipt

**Received - 2022-03-11 05:03:44 PM**  
**Control Number - 52667**  
**ItemNumber - 60**

**PROJECT NO. 52667**

**Progress Filing on Compliance of**  
**Deep East Electric Cooperative Association's Updating its**  
**House Bill 4150 and PURA § 38.004(b) Compliance Report**

March 11, 2022

**Public Utility Commission Central Records**

**Attn: Filing Clerk**

**P.O. Box 13326**

**Austin, TX 78711-3326**

RE: Project 52667 Filing related to Compliance Progress for Deep East Electric Cooperative Association ("*DETEC*")

Pursuant to a March 4, 2022 letter received by DETEC from the Division of Compliance and Enforcement of the Public Utility Commission of Texas ("*PUC*"), DETEC is submitting this update letter regarding its compliance efforts of any non-compliant distribution lines applicable to the requirements of HB 4150.

An update was required by today's date, and DETEC takes its public safety obligations and its obligations to the PUC seriously and as such, DETEC is filing this update letter; but DETEC would note that it is still refining the information as it works with the designated contact at the PUC to aid in a more complete informational update to better comply with the PUC's letter, going forward.

However, DETEC can note for the record, today, that our investigations of the lines in question are indicating that many of such lines were completed in the 1950s or 1960s and others were likely not over wetlands at the time of construction, and would have actually been built to compliance standards at such time. With that said, out of an abundance of caution, DETEC is working diligently and expeditiously to bring any and all such lines into the NESC clearance standards in effect as of September 1, 2019, including gaining any permitting or permissions that may be required as soon as possible.

Moreover, DETEC is attaching certain requested mapping of the lines at issue (Please see enclosed **Maps** exhibit).

Finally, DETEC would note that most of the lines in question are on swampy (and barely accessible) areas of lakes where adding signage notifying the public of any potentially low-clearance lines would be difficult; however, the lines are conspicuous and DETEC is looking for best feasible options to adequately make the public more aware of any and all lower-clearance lines.

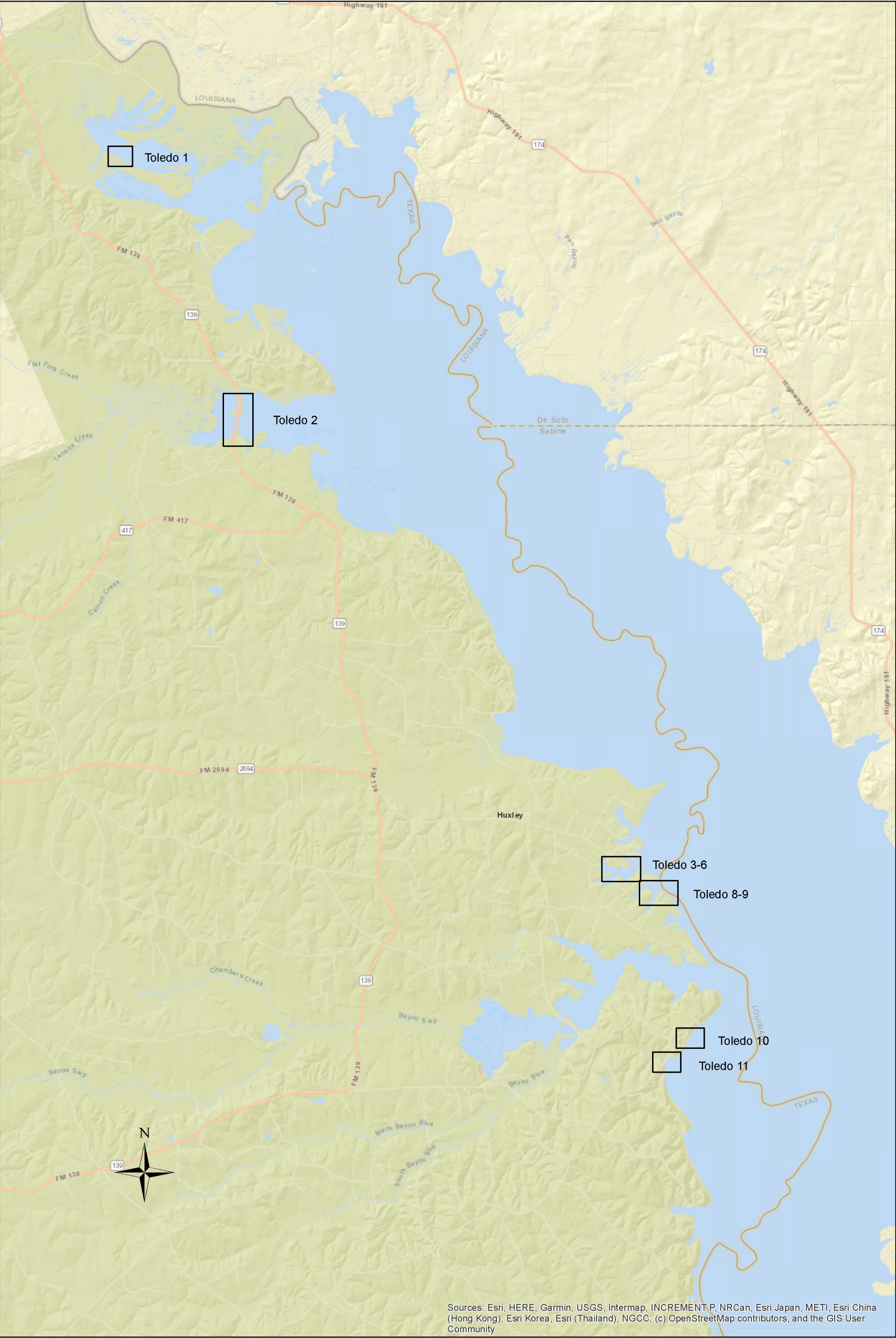
Sincerely,

  
Mr. Kelly Parker, DETEC's *Director of Operations*



# Deep East Texas Electric Cooperative

## Exhibit C - Toledo Bend

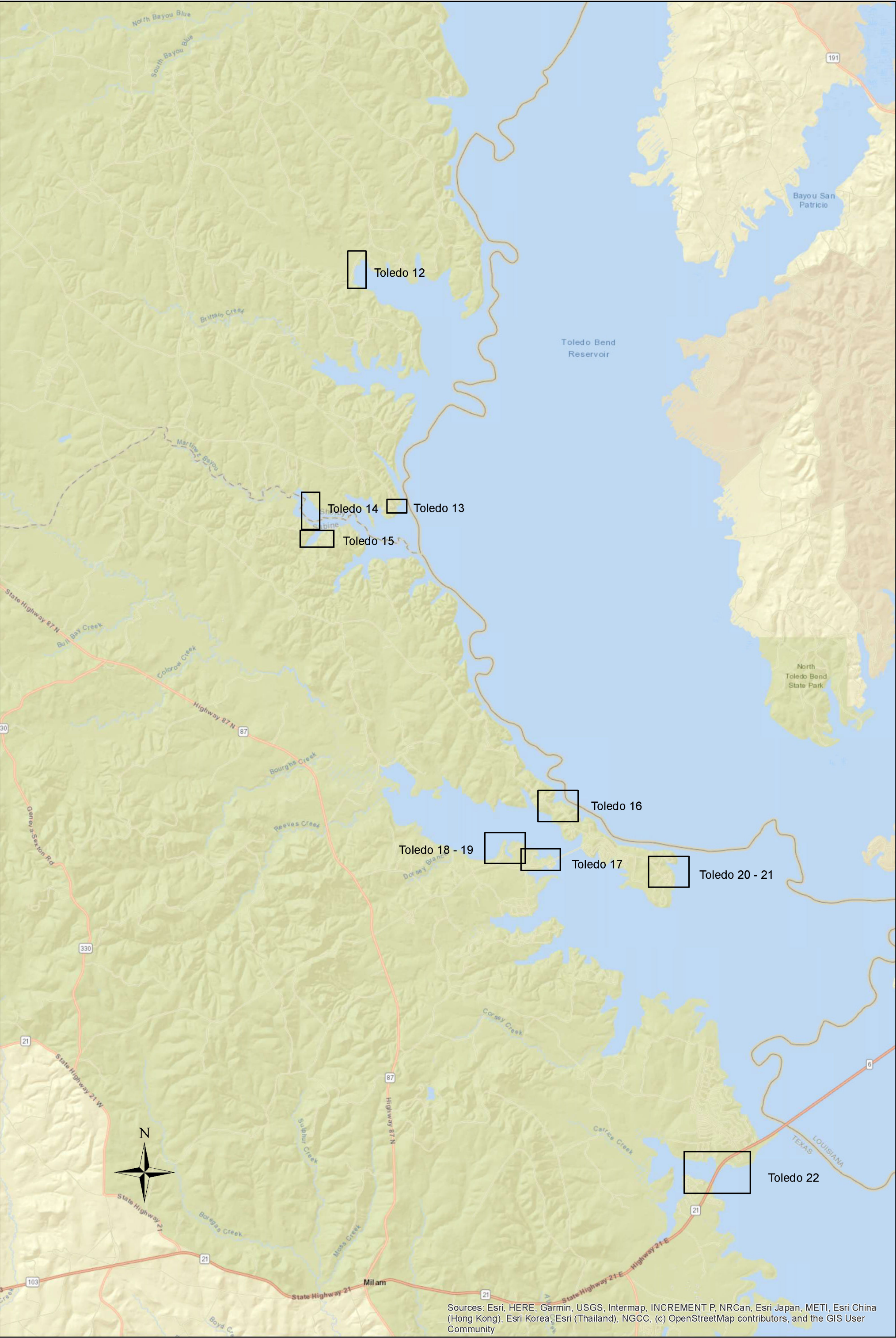


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



# Deep East Texas Electric Cooperative

## Exhibit C - Toledo Bend

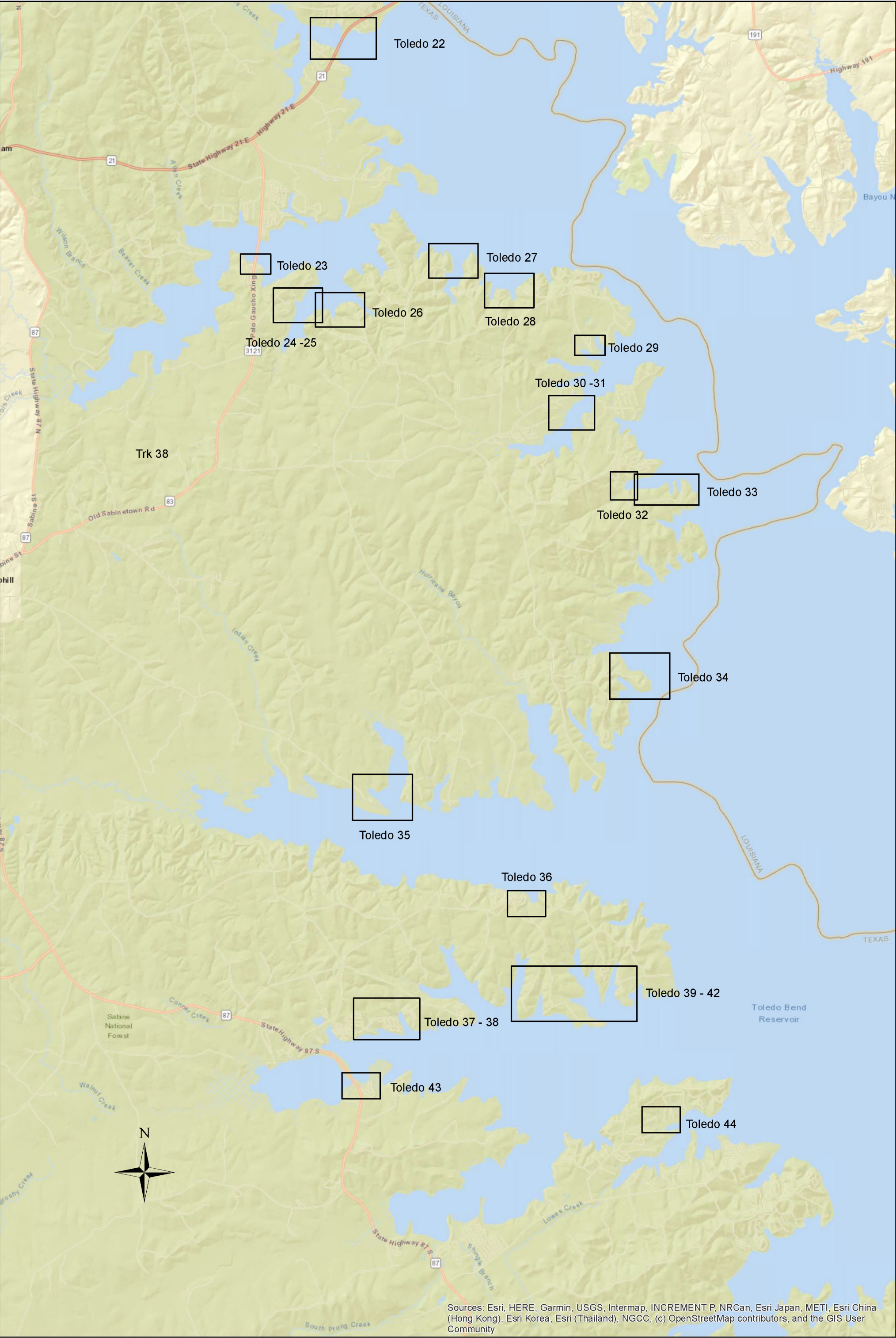


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



# Deep East Texas Electric Cooperative

## Exhibit C - Toledo Bend



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# Deep East Texas Electric Cooperative Exhibit C - Toledo Bend

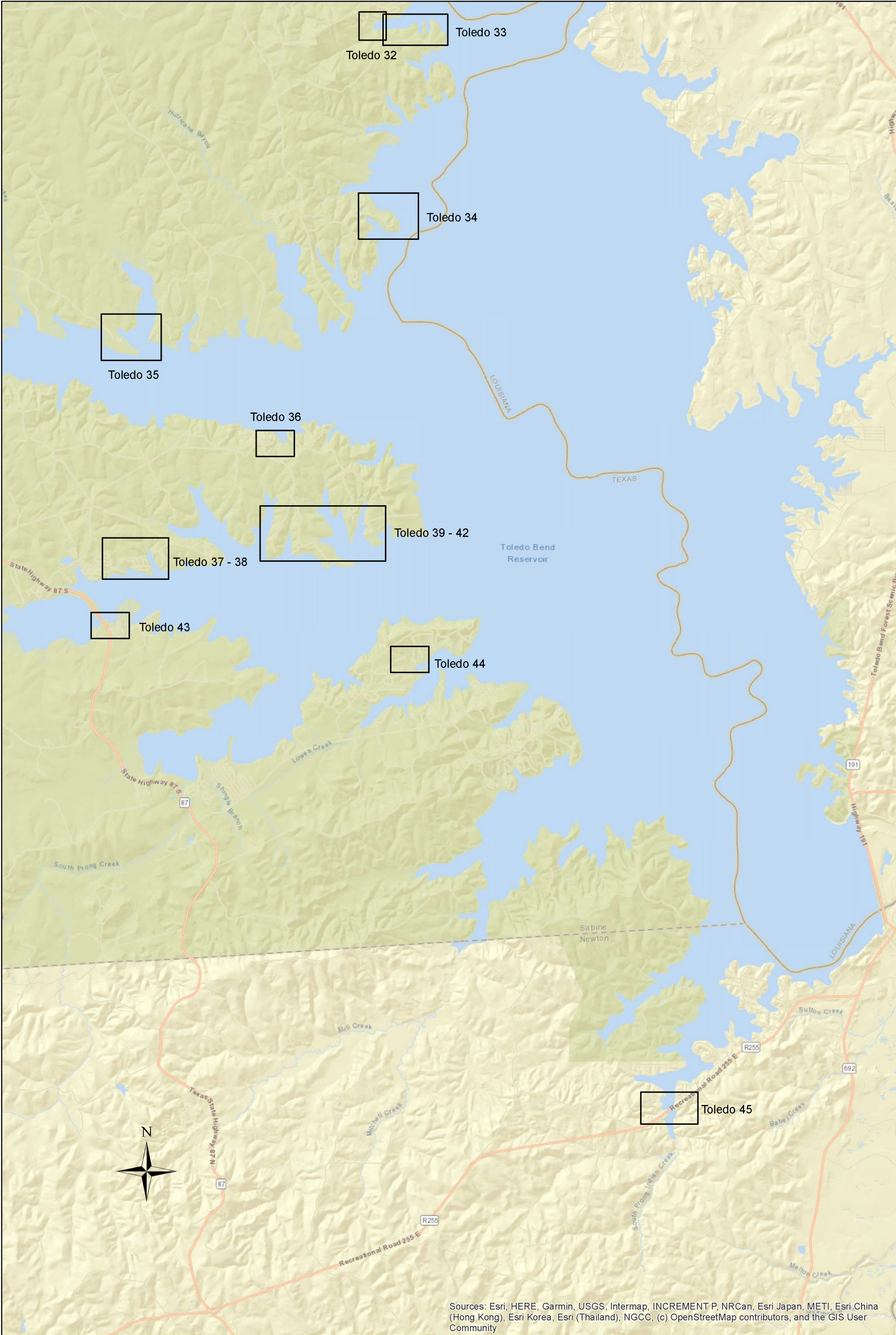




Exhibit B

Reference #	Line Section	Name of Lake	County	Date Verified	Compliance Date	Actions	Current Status	Notes
Toledo 1	OH71217251	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Retire Spans in Violation	Design work to retire lines in violations has been completed. Work order has been issued to construction.	Estimated 2 poles to be retired.
Toledo 2	OH48724651	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	
Toledo 3	OH48799901	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 3-4 poles to be replaced.
Toledo 4	OH48700931	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Installed 1968, Prior to Sail boat clearance in NESC. In compliance with regulations at the time the was constructed. DETEC plans to bring line into compliance with current NESC by the end of the 2022.	Estimated 2 poles to be repalced or bore under lake, install underground cable and retire overhead portion crossing lake.
Toledo 5	OH48700951	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Installed 1968, Prior to Sail boat clearance in NESC. In compliance with regulations at the time the was constructed. DETEC plans to bring line into compliance with current NESC by the end of the 2022.	Estimated 3 poles to be repalced or bore under lake, install underground cable and retire overhead portion crossing lake.
Toledo 6	OH48700941	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 7	OH48700942	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 8	OH71268573	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Bore and replace overhead with underground	Data collection in progress	Estimated 2 poles to be repalced or bore under lake, install underground cable and retire overhead portion crossing lake.
Toledo 9	OH481310371	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.



Toledo 10	OH481421632	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 11	OH481340191	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 4 poles to be replaced.
Toledo 12	OH481390211	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 7 poles to be replaced.
Toledo 13	OH481930361	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress, Preliminary design complete.	Estimated 3 poles to be replaced.
Toledo 14	OH481929741	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 7 poles to be replaced.
Toledo 15	OH481929951	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress, Preliminary design complete.	Estimated 2 poles to be replaced.
Toledo 16	OH482072401	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 17	OH482082171	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 3 poles to be replaced.
Toledo 18	OH71368835	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 19	OH71347351	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.



Toledo 20	OH482084371	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Retire line over lake and changed feed of existing line.	Completed by 3/1/2022	
Toledo 21	OH71376998	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 22	OH482635441	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 10 poles to be replaced. Verifying permitting with TxDOT.
Toledo 23	OH482674222	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced. Possible to retire and re-feed.
Toledo 24	OH482674771	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 25	OH48268491	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 26	OH48268522	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 27	OH482677111	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 3 poles to be replaced.
Toledo 28	OH482677691	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 3 poles to be replaced.
Toledo 29	OH482689512	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.



Toledo 30	OH482698791	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 3 poles to be replaced.
Toledo 31	OH482698581	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 32	OH483219171	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q3 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 33	OH48329961	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 4 poles to be replaced.
Toledo 34	OH483249191	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data acquisition in progress. Preliminary design work complete.	Estimated 2 poles to be replaced and adding 1 pole in-line.
Toledo 35	OH71285995	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 4 poles to be replaced.
Toledo 36	OH483278831	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Design work complete. Special equipment needed to complete construction due to access and terrain.	Estimated 2 poles to be replaced and adding 1 pole in-line.
Toledo 37	OH483296811	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Completed by 3/1/2022	
Toledo 38	OH483296751	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Completed by 3/1/2022	
Toledo 39	OH483298731	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 4 poles to be replaced.



Toledo 40	OH483298591	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 41	OH483298591	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 42	OH483299251	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q4 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data collection in progress	Estimated 2 poles to be replaced.
Toledo 43	OH48385981	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Completed by 3/1/2022	
Toledo 44	OH483820532	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q2 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor OR Retire line and re-feed	Data collection in progress, Attempting to obtain easement from private landowner to re-route and retire line over lake.	Estimated 2 poles to be replaced.
Toledo 45	OH483993251	Toledo Bend	Shelby, Sabine, Newton	12/5/2021	End of Q1 2022	Increase pole heights to become compliant with NESC Table 232-1, 6 OR Bury Conductor	Data acquisition and design work in progress.	Estimated 2 poles to be replaced.